

**REMARKS**

Applicants thank the Examiner for the thorough examination of the application. No new matter is believed to be added to the application by this Amendment.

**Status Of The Claims**

Claims 1-15 are pending in the application. Claim 1 has been amended to improve its language without reducing its scope. The amendments to claim 5 and claims 9-11 find support in paragraph 0023 at page 10, line 18 of the specification. Claim 6 has been amended to improve its language without reducing its scope. Claims 12-15 find support in Figure 7 and in paragraph 0025 at page 12, lines 16-20 of the specification.

**Rejection Under 35 U.S.C. §112, Second Paragraph**

Claims 6 and 8 are rejected under 35 U.S.C. §112, second paragraph as being indefinite. Applicants traverse.

At page 2 of the Office Action, the Examiner asserts that the phrase "stamper electrolyte" lacks full antecedent basis. However, independent claim 5 has been amended to recite this term so as to give full antecedence to claims 6 and 8. As a result, the claims are clear, definite and have full antecedent basis.

This rejection is overcome and withdrawal thereof is respectfully requested.

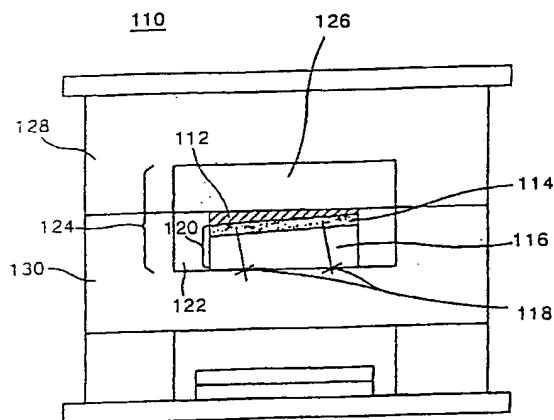
### **Rejections Over Higuchi**

Claims 1, 3, 5 and 7 are rejected under 35 U.S.C. §102(e) as being anticipated by Higuchi (U.S. Patent 6,132,652). Claims 2, 4, 6, and 8 are rejected under 35 U.S.C. §103(a) as being obvious over the single reference of Higuchi. Applicants traverse.

### **The Present Invention And Its Advantages**

The present invention pertains to a mold apparatus for manufacturing a light guide. One of the many embodiments of the present invention is illustrated in Figure 7, which is introduced below.

FIG. 7



In Figure 7 of the present invention, the light guide injection-molding device 110 includes a stamper 114 provided with prism unevenness grooves on a surface contacting an injected light guide material, a molding core 116 to which the stamper 114 is integrally attached, one or more bolts 118 for engaging the stamper 114 with the

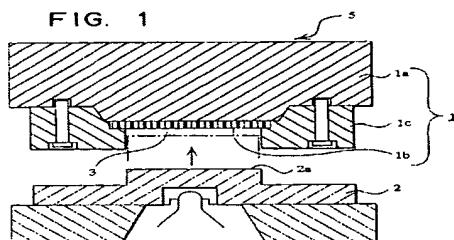
molding core 116, a stationary core 126 constituting a mold 124 along with the integral-type molding device 120 made by engaging the stamper 114 and the molding core 116, and a movable core 122, and a stationary molding plate 128 and a movable molding plate 130 for fixing the stationary core 126 and the movable core 122 at the exterior thereof, respectively.

The present invention has many embodiments, and a typical embodiment can be found in claim 1: "A portion of a mold apparatus for manufacturing a light guide, comprising: a stamper configured to define a surface of a light guide; and a core material portion fixed to said stamper by a fixing structure, wherein said fixing structure comprises at least one fastening member."

*Distinctions Of The Invention Over Higuchi*

Higuchi utterly fails to disclose or suggest a core material to which the stamper is integrally attached.

Higuchi pertains to a method for producing a light guide plate for a surface light guide source. The mold used by Higuchi is depicted in Figure 1 of that reference, which is reproduced below.



The mold of Figure 1 of Higuchi is described at column 5, lines 44-65:

The first metal mold 1 comprises a common use base portion 1a, a plate-shaped metal mold 1b, and a holding member 1c. The plate-shaped metal mold 1b has a pattern surface corresponding to the fine pattern of the light emitting surface 4a of the lightguide plate for surface light source 4, and is arranged with its surface opposite to the pattern surface (hereinafter referred to as a ground surface) directed toward the common use base portion 1a. The plate-shaped metal mold 1b thus arranged defines the shape of a part of the cavity 3 of the molding die 5 (a portion corresponding to the light emitting surface 4a of the lightguide plate for surface light source 4). The plate-shaped metal mold 1b is so provided as to be replaceable with respect to the common use base portion 1a.

The holding member 1c is for holding an outer edge portion of the plate-shaped metal mold 1b and fixing the outer edge portion to the common use base portion 1a. The holding member 1c is for also defining the shape of a part of the cavity 3 of the molding die 5 (a side surface portion of the lightguide plate for surface light source 4), and is detachable from the common use base portion 1a by a bolt. That is, the holding member 1c is also replaceable.

That is, the metal mold 1b of Higuchi is directly affixed to the molding die 5, and

Higuchi's molding die 5 corresponds to movable molding plate 130 shown in Figure 7 of

the present invention. There is thus no feature in Figure 1 of Higuchi that corresponds to the molding core 116 (core material portion) of claims 1 and 5 of the present invention.

Also, the bolts in Figure 1 of Higuchi holds the metal mold 1b fast to the base portion 1a by utilizing the holding member 1c as a clamp. In contrast, the present invention uses a fastening member through the core material into the stamper (see claim 2). As a result, the present invention has an integral molding device (claims 12 and 14) that cannot be attained by the clamping technology necessitated by Higuchi's failure to integrate a stamper with a core material.

Higuchi thus fails to disclose each and every element of independent claims 1 and 5.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the . . . claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "[A]ll the claim limitations must be taught or suggested by the prior art." In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). "All the words of a claim must be considered in judging the patentability of that claim against the prior art." In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970).

Higuchi thus fails to anticipate the present invention of claims 1 and 5. Claims depending on claims 1 and 5 are patentable for at least the above reasons.

At page 3 lines 1-3 of the Office Action the Examiner unequivocally admits to the failures of Higuchi: "essentially lacking the aspects of the fastening member extending through the stamper and the exact thickness of the stamper." The Examiner then asserts that one having ordinary skill in the art would be motivated by the single reference of Higuchi to produce these embodiments.

To establish a *prima facie* case of obviousness, "the prior art reference (or references when combined) must teach or suggest all the claim limitations." MPEP §2143. In addition, if a reference needs to be modified to achieve the claimed invention "there must be a showing of a suggestion or motivation to modify the teachings of that reference to the claimed invention in order to support the obviousness conclusion." Sibia Neurosciences Inc. v. Cadus Pharmaceutical Corp., 225 F.3d 1349, 55 USPQ2d 1927 (Fed. Cir. 2000).

In this case, the Examiner fails to point out where in the single reference in Higuchi itself the teaching or motivation lies to modify the reference to produce the invention of claims 2, 4, 6 and 8. A *prima facie* case of obviousness has thus not been made.

These rejections are overcome and withdrawal thereof is respectfully requested. In view of the above amendment, applicant believes the pending application is in condition for allowance.

**Information Disclosure Statement**

The Examiner is thanked for considered the Information Disclosure Statement filed November 7, 2003, and for making the initialed PTO-1449 of record in the present application in the Office Action mailed August 2, 2005.

**Drawings**

The Examiner is respectfully requested to indicate whether drawing figures are acceptable in the next Official Action.

**Foreign Priority**

The Examiner has acknowledged foreign priority and has indicated that the priority documents have been received in Parent Application No. 08/742,500.

**Assignment**

The Assignment was recorded on April 25, 2001, at Reel 011762/Frames 0491-0493.

**Conclusion**

The Examiner's rejections have been overcome, obviated or rendered moot. No issues remain. The Examiner is accordingly requested to place the application into condition for allowance and to issue a Notice of Allowability.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Robert E. Goozner, Ph.D.

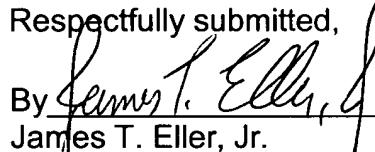
(Reg. No. 42,593) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Dated: November 2, 2005



Respectfully submitted,

By   
James T. Eller, Jr.

Registration No.: 39,538  
BIRCH, STEWART, KOLASCH & BIRCH, LLP  
8110 Gatehouse Road  
Suite 100 East  
P.O. Box 747  
Falls Church, Virginia 22040-0747  
(703) 205-8000  
Attorney for Applicant